

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

**THE DRA PARTIES' MOTION IN COMPLIANCE WITH ORDER  
DIRECTING UNSEALING OF DRA PARTIES' (I) OBJECTION TO THE SEVENTH  
AMENDED TITLE III JOINT PLAN OF ADJUSTMENT OF THE COMMONWEALTH  
OF PUERTO RICO, ET AL. AND (II) EXPERT REPORTS IN SUPPORT THEREOF**

**To The Honorable United States District Judge Laura Taylor Swain:**

**COME NOW** AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor,” and together with the Servicer, collectively, the “DRA Parties”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds that the DRA issued pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018, and the approved Qualifying Modification for the Government Development Bank

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801).

for Puerto Rico (the “GDB”)<sup>2</sup> under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), by and through the undersigned legal counsel, and respectfully submit this motion (the “Motion”) in compliance with the Court’s October 21, 2021 *Order Directing Unsealing of DRA parties’ (I) Objection to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. and (II) Expert Reports in Support Thereof* [ECF No. 18834] (the “Unsealing Order”).

1. The Unsealing Order directs the DRA Parties to file by October 29, 2021 at 5:00 P.M. (Atlantic Standard Time) either (i) “a certification that the Unredacted Documents<sup>[3]</sup> do not require any additional redactions to comply with Rule 9037(a), or (ii) refile the Unredacted Documents with only the redactions required by Federal Rule of Bankruptcy Procedure 9037(a).” *Id.* at p. 2.

2. In compliance with the Unsealing Order, the DRA Parties are hereby refiling the Unredacted Documents with only the necessary redactions under Fed. R. Bankr. P. 9037(a) as exhibits to this Motion.

**WHEREFORE**, the DRA Parties request that the Court deem the DRA Parties in compliance with the Unsealing Order and accept the refiling of the Unredacted Documents attached as exhibits to this Motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 28<sup>th</sup> day of October, 2021.

**WE HEREBY CERTIFY** that, in accordance with the Court’s *Fifteenth Amended Notice, Case Management and Administrative Procedures Order* (the “CMP Order”) [Dkt. No. 17127-1] on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this

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<sup>2</sup> See ECF No. 270 of Civil Case No. 18- 01561 (LTS) (Nov. 7, 2018).

<sup>3</sup> Capitalized terms not defined in this motion shall have the meaning ascribed to them in the Unsealing Order.

case. We further certify that, on this same date, we served the foregoing upon all the Standard Parties as identified and defined in the CMP Order.

*[Remainder of page intentionally left in blank]*

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